

138
United States District Court
Southern District of Texas
FILED

DEC 15 2020

David J. Bradley, Clerk

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
McALLEN DIVISION

UNITED STATES OF AMERICA §
 §
v. § Criminal No. M-20-1900-S1
 §
GIOVANA MARTINEZ §
RODOLFO MARTINEZ §
NORMA JASSMIN HERNANDEZ §

SEALED SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES:

Count One

From on or about August 12, 2020, through on or about November 6, 2020, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

**GIOVANA MARTINEZ
RODOLFO MARTINEZ
and
NORMA JASSMIN HERNANDEZ**

did knowingly and intentionally conspire and agree together and with other persons known and unknown to the Grand Jurors, to import into the United States of America from the United Mexican States a controlled substance. The controlled substance involved was five kilograms or more of a mixture or substance containing a detectable amount of cocaine, 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, Schedule II controlled substances, and one kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 963, 952(a), 960(a)(1), and 960(b)(1).

Count Two

On or about October 14, 2020, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

**GIOVANA MARTINEZ
and
RODOLFO MARTINEZ**

did knowingly and intentionally import into the United States of America from the United Mexican States a controlled substance. The controlled substance involved was 500 grams or more, that is, approximately 18.4 kilograms of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 952(a), 960(a)(1), and 960(b)(1) and Title 18, United States Code, Section 2.

Count Three

On or about November 6, 2020, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

NORMA JASSMIN HERNANDEZ

did knowingly and intentionally import into the United States of America from the United Mexican States a controlled substance. The controlled substance involved was one kilogram or more, that is, approximately 8 kilograms of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, and five kilograms or more, that is, approximately 18.7 kilograms of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 952(a), 960(a)(1), and 960(b)(1) and Title 18, United States Code, Section 2.

Count Four

On or about August 12, 2020, through on or about November 6, 2020, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

**GIOVANA MARTINEZ
RODOLFO MARTINEZ
and
NORMA JASSMIN HERNANDEZ**

did knowingly and intentionally conspire and agree together and with other persons known and unknown to the Grand Jurors, to possess with intent to distribute a controlled substance. The controlled substance involved was 5 kilograms or more of a mixture or substance containing a detectable amount of cocaine, 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, Schedule II controlled substances, and 1 kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(A).

Count Five

On or about October 14, 2020, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

**GIOVANA MARTINEZ
and
RODOLFO MARTINEZ**

did knowingly and intentionally possess with intent to distribute a controlled substance. The controlled substance involved was 500 grams or more, that is, approximately 18.4 kilograms of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A) and Title 18, United States Code, Section 2.

Count Six

On or about November 6, 2020, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

NORMA JASSMIN HERNANDEZ

did knowingly and intentionally possess with intent to distribute a controlled substance. The controlled substance involved was one kilogram or more, that is, approximately 8 kilograms of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, and five kilograms or more, that is, approximately 18.7 kilograms of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A) and Title 18, United States Code, Section 2.

A TRUE BILL



FOREPERSON

RYAN K. PATRICK
UNITED STATES ATTORNEY



ASSISTANT UNITED STATES ATTORNEY